

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	Case No. 09-10169
)	
EXCALIBUR MACHINE CO., INC.,)	Chapter 11
)	
Debtor-in-Possession)	Docket No. ____
)	
)	
EXCALIBUR MACHINE CO., INC.,)	
)	
Movant)	
)	
vs.)	
)	
)	Date and Time of Hearing:
NO RESPONDENT)	February 6, 2009 at 10:00 a.m.

MOTION FOR JOINT ADMINISTRATION OF AFFILIATED CHAPTER 11 CASES

AND NOW, comes the above-captioned debtor-in-possession, by and through its counsel, Knox McLaughlin Gornall & Sennett, P.C., with this Motion for Joint Administration of Affiliated Chapter 11 Cases, as follows:

1. The debtor-in-possession, Excalibur Machine Co., Inc. ("Excalibur") is a Pennsylvania business corporation with an office at 9723 U.S. Highway 322, Conneaut Lake, Pennsylvania 16316. Excalibur filed a Petition for Relief under Chapter 11 of the Bankruptcy Code on January 31, 2009 at the above-referenced Chapter 11 case number.

2. Excalibur is represented by Knox McLaughlin Gornall & Sennett, P.C., 120 West Tenth Street, Erie, Pennsylvania 16501, Attention: Guy C. Fustine and Joseph F. Gula, III.

3. Based upon the definition of "affiliate" under Section 101 of the Bankruptcy Code (11 U.S.C. §101(2)), the above-captioned debtor-in-possession is affiliated with seven (7) other corporations, for a total of eight (8) affiliated corporations, all of which filed separate Chapter 11 Petitions in this Court on January 31, 2009, as follows:

<u>Case Name</u>	<u>Case Number</u>
Excalibur Machine Co., Inc. (“Excalibur”)	09-10169
Camelot Consolidated, Inc. (“Camelot”)	09-10170
Blade Transport, Inc. (“Blade”)	09-10171
Multi-Plastics, Inc. (“Multi-Plastics”)	09-10172
Multi-Tool, Inc. (“Multi-Tool”)	09-10173
Multi-Plastics of New Mexico, Inc. (“MPNM”)	09-10174
Sipco, Inc. (“Sipco”)	09-10175
E.A.H. Industries, Inc. (“EAH”)	09-10176

4. Excalibur is a large fabrication and machining operation that provides goods and services to tier one customers. The markets served include transportation, alternative energy, and power generation. The customers are primarily Fortune 500 Companies. Excalibur produces large steel and metal products and has limited competition because of the size of its products.

5. Camelot is a Pennsylvania business corporation with an address at 9723 U.S. Highway 322, Conneaut Lake, Pennsylvania 16316. Camelot is a sales organization for Excalibur and CORE Manufacturing.¹ Camelot sells only goods and services produced by Excalibur or related CORE Companies.

6. Blade is a Pennsylvania business corporation with an address of 9723 U.S. Highway 322, Conneaut Lake, Pennsylvania 16316. Blade provides trucking and transportation services for Excalibur and related CORE Companies.

7. Multi-Plastics is a Pennsylvania business corporation with an address at Route 198, Cook Road, Saegertown, Pennsylvania 16433. Multi-Plastics is a plastics custom and production injection molding operation for primary tier two and three organizations.

¹ CORE Manufacturing is the name used by the affiliated companies to do business as one entity. The proposed consolidation of the companies under CORE was in process when the Chapter 11 cases were filed, but was not finalized before the filing.

8. Multi-Tool is a Pennsylvania business corporation with an address at Route 198 South Street, Saegertown, Pennsylvania 16433. Multi-Tool was a metals, mold and tool building and repair shop. The customer base of Multi-Tool has been transferred to SIPCO.

9. MPNM is a New Mexico business corporation with an address at 2100 S Valley Drive, Las Cruces, New Mexico 88005 and a mailing address outside of New Mexico at P.O. Box 708, Saegertown, Pennsylvania 16433. MPNM is a plastics custom and production injection molding operation for primary tier two and three organizations. MPNM produces piece parts to supply manufacturing performed in Mexico.

10. Sipco is a Pennsylvania business corporation with an address at 1099 Morgan Village Road, Meadville, Pennsylvania 16335. Sipco is a small metals machining operation including production machining and custom precision machining for the metals industry. Sipco also performs mold and tool building and repair.

11. EAH is a Pennsylvania business corporation with an address of 1099 Morgan Village Road, Meadville, Pennsylvania 16335. EAH, f/d/b/a Sipco Molding Technologies, was a plastics custom production and injection molding operation for primary tier two and three customers. The production work and customers of EAH have been transferred to Multi-Plastics and MPNM.

12. There are numerous guarantees and cross-guarantees of debt by and among the affiliated companies and the owners.

13. The affiliated companies referred to above share the same ownership, creditors and major customers. The affiliated companies also share the same business enterprise, having held themselves out as CORE Manufacturing.

14. The Bankruptcy Court has the power and authority to issue an order for joint administration of the affiliated companies under Bankruptcy Rule 1015(b) and 11 U.S.C. §105(a).

15. It would be virtually impossible to conduct these Chapter 11 proceedings separately in a cost-effective manner, especially given the fact that the debtors have already held themselves out as a consolidated entity.

16. The debtors request that separate dockets be maintained for each Chapter 11 case, including a separate claims register. In this way, any potential conflicts as they relate to the mix of claims against each debtor will be preserved. However, if an order for joint administration is entered, all pleadings and orders would be filed under one case number.

17. The best interest of the debtors, creditors and other parties in interest will be served if an order for joint administration is entered in these Chapter 11 cases, i.e. the cases are consolidated for administrative purposes.

18. An order for joint administration would also encourage the most effective use of available judicial resources.

19. An identical motion for joint administration is being filed in each one of the affiliated cases.

20. The caption of the consolidated cases would be as follows:

Excalibur Machine Co., Inc.; Camelot Consolidated, Inc.; Blade Transport, Inc.; Multi-Plastics, Inc.; Multi-Tool, Inc.; Multi-Plastics of New Mexico, Inc.; Sipco, Inc.; and, E.A.H. Industries, Inc., Debtors-in-Possession, Consolidated for Administration at Chapter 11 Case Number 09-10169.

21. A proposed order is attached hereto and incorporated herein by reference.

WHEREFORE, the debtor-in-possession requests that the above-referenced Chapter 11 cases, filed on behalf of affiliated debtors-in-possession, be consolidated for administration as set

forth above and as set forth in the attached proposed order for joint administration under Bankruptcy Rule 1015(b); and, that the movant have such other and further relief as is reasonable and just.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.
Attorneys for Debtor-in-possession

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